

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION**

JASON ALFORD, *et al.*,

Plaintiffs,

v.

THE NFL PLAYER DISABILITY &
SURVIVOR BENEFIT PLAN, *et al.*,

Defendants.

Case No. 1:23-cv-00358-JRR

**DECLARATION OF HESSAM (“SAM”) VINCENT IN SUPPORT OF
DEFENDANTS’ JOINT RULE 12(b)(6) MOTION TO DISMISS**

I, Hessam (“Sam”) Vincent, hereby declare pursuant to 28 U.S.C. § 1746, under the penalty of perjury, that the following is true and correct to the best of my knowledge, information, and belief:

1. I am the Disability Relations Manager for the NFL Player Disability & Survivor Benefit Plan (the “Disability Plan” or the “Plan”). I respectfully submit this Declaration in Support of Defendants’ Joint Rule 12(b)(6) Motion to Dismiss in the above-captioned action. I have personal knowledge of the matters set forth herein based on my role as Plan Manager. If called to testify as a witness in this action, I could and would testify competently thereto.

2. Attached as **Exhibit B** is a true and correct copy of the Bert Bell/Pete Rozelle NFL Player Retirement Plan Document, amended and restated as of April 1, 2021.

3. Attached as **Exhibit C** is a true and correct copy of the NFL Player Disability & Survivor Benefit Plan, amended and restated as of April 1, 2021.

4. Attached as **Exhibit D** is a true and correct copy of the October 2022 Disability Plan Summary Plan Description.

5. Attached as **Exhibit E** is a true and correct copy of Plaintiff Jason Alford’s Board decision letter dated February 14, 2020.

6. Attached as **Exhibit F** is a true and correct copy of Plaintiff Jason Alford’s Committee determination letter dated April 12, 2022.

7. Attached as **Exhibit G** is a true and correct copy of Plaintiff Jason Alford’s Board decision letter dated March 10, 2023.

8. Attached as **Exhibit H** is a true and correct copy of Plaintiff Daniel Loper’s Board decision letter dated February 19, 2019.

9. Attached as **Exhibit I** is a true and correct copy of Plaintiff Daniel Loper's Board decision letter dated November 15, 2021.

10. Attached as **Exhibit J** is a true and correct copy of Plaintiff Willis McGahee's Committee determination letter dated August 8, 2016.

11. Attached as **Exhibit K** is a true and correct copy of Plaintiff Willis McGahee's Board decision letter dated November 22, 2022.

12. Attached as **Exhibit L** is a true and correct copy of Plaintiff Michael McKenzie's Board decision letter dated November 22, 2019.

13. Attached as **Exhibit M** is a true and correct copy of Plaintiff Michael McKenzie's Board decision letter dated June 6, 2022.

14. Attached as **Exhibit N** is a true and correct copy of Plaintiff Jamize Olawale's Board decision letter dated June 6, 2022.

15. Attached as **Exhibit O** is a true and correct copy of Plaintiff Alex Parsons's Board decision letter dated May 18, 2018.

16. Attached as **Exhibit P** is a true and correct copy of Plaintiff Eric Smith's Board decision letter dated February 24, 2014.

17. Attached as **Exhibit Q** is a true and correct copy of Plaintiff Eric Smith's Committee determination letter dated April 13, 2015.

18. Attached as **Exhibit R** is a true and correct copy of Plaintiff Eric Smith's Board decision letter dated November 22, 2019.

19. Attached as **Exhibit S** is a true and correct copy of Plaintiff Charles Sims's Committee determination letter dated June 11, 2021.

20. Attached as **Exhibit T** is a true and correct copy of Plaintiff Charles Sims's Board decision letter dated June 3, 2022.

21. Attached as **Exhibit U** is a true and correct copy of Plaintiff Joey Thomas's Board decision letter dated February 13, 2020.

22. Attached as **Exhibit V** is a true and correct copy of Plaintiff Joey Thomas's Board decision letter dated March 9, 2023.

23. Attached as **Exhibit W** is a true and correct copy of Plaintiff Lance Zeno's Board decision letter dated November 22, 2022.

Executed this 20th day of April, 2023 at Baltimore, Maryland.

Hessam Vincent

Hessam ("Sam") Vincent